


Barry Tornick/R2/USEPA/US

10/10/2008 09:33 AM

To "Frank Faranca" <Frank.Faranca@dep.state.nj.us>

cc Sin-Kie Tjho/R2/USEPA/US@EPA,  
Everett.Adolph@epamail.epa.gov@EPA

bcc

Subject Re: DuPont (Deepwater) Draft PFOA Letter 

The letters look alright. Has there been any internal discussion about what involvement, if any, you want from EPA?

"Frank Faranca" <Frank.Faranca@dep.state.nj.us>



"Frank Faranca"  
<Frank.Faranca@dep.state  
.nj.us>

10/09/2008 03:46 PM

To Sin-Kie Tjho/R2/USEPA/US@EPA, Barry  
Tornick/R2/USEPA/US@EPA

cc

Subject Draft PFOA Letter

Sin-Kie & Barry,

Attached please find a copy of my draft letter to DuPont. This letter is in for Assistant Commissioner Kropp's review. We anticipate sending the letter on Tuesday. Please let me know if you have any comments.

I hope to have all the issues resolved by next week. Also attached please find a letter to Penns Grove Water Purveyor requiring Treatment for PFOA on anything over 0.04 ppb.

Frank

Frank Faranca, CHMM  
Site Remediation Technical Specialist  
NJDEP/ Bureau of Case Management  
401 East State Street  
P. O. Box 028  
Trenton, NJ 08625-0028  
Phone: 609-984-4071  
Fax: 609-633-1439

e-mail: [Frank.Faranca@dep.state.nj.us](mailto:Frank.Faranca@dep.state.nj.us)

Please Note: New Jersey has a very broad public records law. Most written

communications to or from state officials regarding state business are public

records available to the public and media upon request. Your e-mail is communications and may therefore be subject to public disclosure.



Draft PFOA Letter.doc PFOA Treatment for Penns Grove.doc



## State of New Jersey

### Department of Environmental Protection

Division of Remediation Management and Response

Bureau of Case Management

P.O. Box 028

Trenton, New Jersey 08625-0028

Phone: (609) 633-1455

Fax: (609) 633-1439

Jon S. Corzine  
Governor

Lisa P. Jackson  
Commissioner

October 9, 2008

Andrew S. Hartten  
DuPont Corporate Remediation Group  
Barley Mill Plaza 19/2204  
4417 Lancaster Avenue  
Wilmington, DE 19805

### Phase II - PFOA Ground Water Investigation

Re: 2 – Mile Radius Private Well Search Report  
DuPont Chambers Works  
Rt. 130  
Block: 185; Lots: 1, 2, 3  
Block: 301; Lots: 1, 2, 3, 4, 5  
Block: 193; Lot: 5  
Deepwater, NJ 08023  
SRP PI# 008221

Dear Mr. Hartten:

The New Jersey Department of Environmental Protection (Department) and the US Environmental Protection Agency (EPA) completed our review of the 2-Mile Radius Private Well Search Report received on September 16, 2008. The Department and EPA have determined that the Draft Well Search Report is acceptable; however, additional work is required.

The Department has performed air dispersion modeling using meteorological data from Wilmington International Airport (1990-1994) which shows that air emissions from the Chambers Works Facility may reach a distance of at least 1½ miles or more beyond the facility's property line, when assuming a release height of 25 feet (see attached figure).

Therefore, DuPont is required to take the following steps:

1. DuPont shall complete the investigation on all remaining private well locations shown in the potable well Excel file with a #2 and #3 map rankings and submit that information to the regulatory agencies for review.
2. DuPont shall plot all of the confirmed private wells on a map along with the newly installed (9) and proposed (5) DuPont PFOA monitoring wells.
3. DuPont shall also immediately begin the process of arranging and collecting potable water samples for PFOA analysis plus 12 perfluorinated compounds from all homes within the 2-mile radius.

Pursuant to the schedule applicable to the site, DuPont shall submit the above referenced information as follows:

- ◆ November 14, 2008 – As per your email of September 16, 2008, please submit the completed well search on the #2 and #3 map rankings along with a revised map. In addition, DuPont shall submit a detailed schedule for the collection, analysis and submission of results for all private potable water samples at all the locations identified within a 2-mile radius. The sampling protocol shall be as established in the July 10, 2007 PFOA Investigation Work Plan approval. A NJDEP Certified Laboratory shall be utilized to analyze these samples for PFOA and the suite of 12 perfluorinated compounds.

The Department shall be contacted immediately if data indicates levels above the Departments PFOA Drinking Water Guidance Value of 0.04 ppb. Additional documentation shall also be submitted regarding any detection above the guidance value including but not limited to the well location, preliminary and final laboratory data and any actions taken.

Please submit the documents by these dates, or submit a written request for an extension at least 2 weeks prior to the due date. Failure to submit these documents in accordance with the schedule may result in the initiation of enforcement action. For your convenience, the regulations concerning the Department's remediation requirements can be found at <http://www.state.nj.us/dep/srp/regs/>.

Thank you for your cooperation in this matter. If you have any questions, please call me at

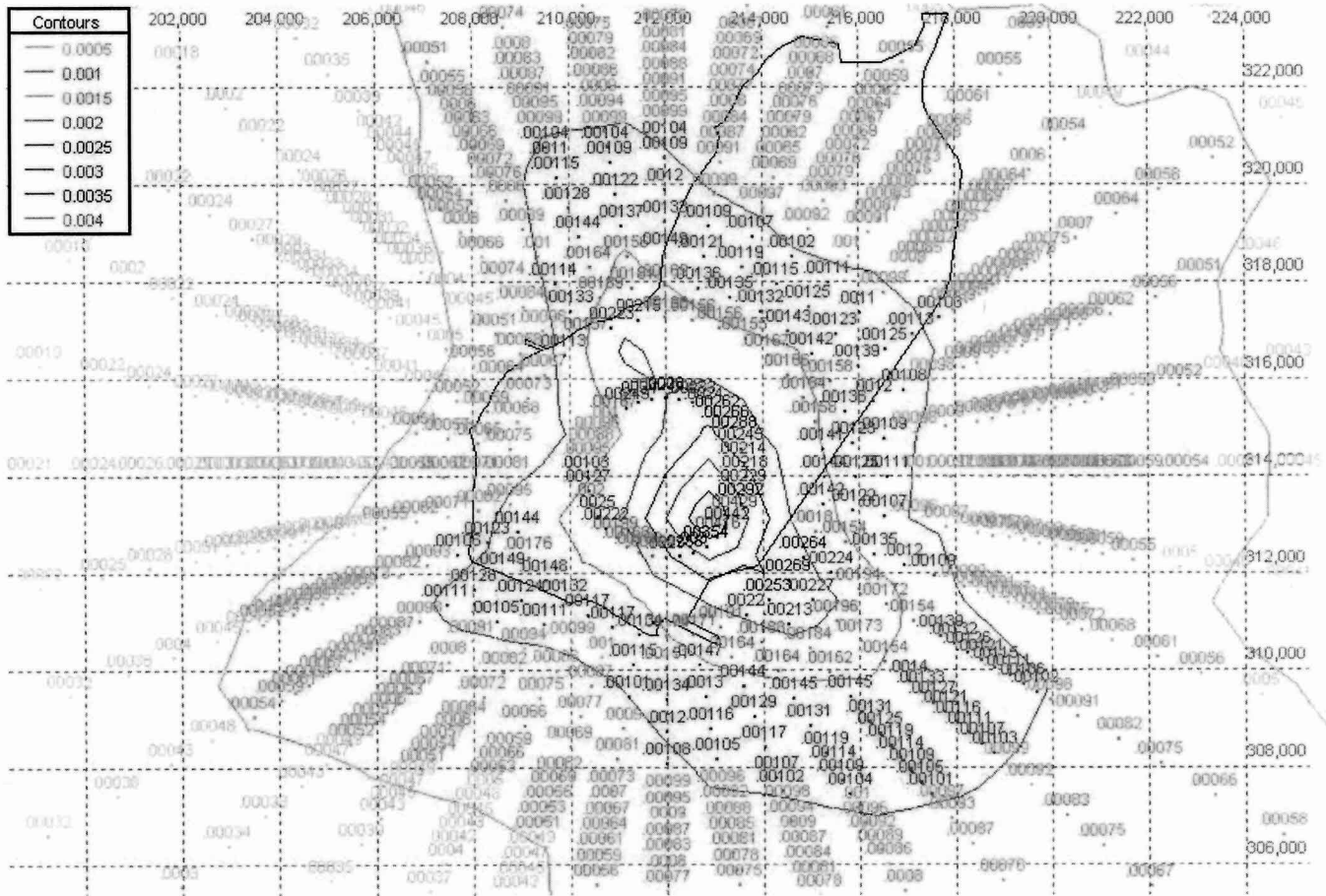
Sincerely,

Frank Faranca, CHMM, Site Remediation Technical Specialist  
Bureau of Case Management

Attachment

Cc: David Doyle, NJDEP/BEERA  
Anne Pavelka, NJDEP/BGWPA  
Barry Tornick, USEPA, Region II  
Nicole Kraft, USEPA, Region II  
Sin-Kie Tjho, USEPA, Region II

# Attachment



Andrew S. Hartten  
DuPont Corporate Remediation Group  
Barley Mill Plaza 19/2204  
4417 Lancaster Av.  
Wilmington, DE 19805

Mr. Sin-Kie Tjho, RCRA Programs Branch  
U.S.E.P.A., Region II – 22<sup>nd</sup> Floor  
290 Broadway Avenue  
New York, NY 10007-1866

Ms. Nicole Kraft  
U.S.E.P.A. REGION 2 – 22<sup>nd</sup> Floor  
290 Broadway  
New York, NY 10007-1866

Ms. Karen Johnson  
U.S.E.P.A. REGION 3  
1650 Arch Street  
**Mail Code:** 3WP22  
Philadelphia, PA 19103-2029

Herbert Roeschke  
Cumberland/Salem Co. Dept of Health  
98 Market Street  
Salem, NJ 08079-1995

Salem County Planning Board  
Salem County Offices  
96-98 Market Street  
Salem, NJ 08079

John Crawford  
Pennsville Township  
90 N Broadway  
Pennsville, NJ 08070

Division of Water Supply - Water Supply Operations  
401 E. State Street - P.O. Box 426  
Trenton, New Jersey 08625-0426  
Tel #: (609) 292-5550 - Fax #: (609) 292-1654  
<http://www.state.nj.us/dep/watersupply/>

October 8, 2008

**CERTIFIED MAIL / RRR**  
**7003 1010 0002 6065 3305**

Dave Forsinto  
NJ American Water - Penns Grove  
NJAW Delaware River Township  
213 Carriage Lane  
Delran Township, New Jersey 08075

Re: NJ American Water - Penns Grove  
PWSID NO. NJ1707001  
Development of a Plan to Reduce Perfluorooctanoic acid (PFOA)

Dear Mr. Forsinto:

In a letter dated March 3, 2008, the Department of Environmental Protection (Department) approved a modified blend request for New Jersey American Water – Penns Grove for Well 11A with either Well 2 and/or Well 4 in the Layton Well field. This blend request was approved in order to reduce the sodium level in the water at the point-of-entry to the distribution system below the recommended upper limit of 50 milligrams per liter (mg/l) and to maintain PFOA levels below the State guidance value of 0.04 micrograms per liter (ug/l). Since that time, the Department has reviewed the PFOA monitoring data submitted from the two points-of-entry at the New Jersey American Water – Penns Grove: the Layton Well Field and the Ranney Well field. The Department has also reviewed the data collected from the individual wells.

The current running annual average for PFOA at TP002007, the Layton Well field is as follows:

Sampling Date	Sample Number	PFOA Result (ug/l)
3/8/07	D7C090378-008	0.09
6/18/07	D7F190311-001	0.10
9/26/07	D71270405-009*	0.073
12/17/07	D7L180307-008	0.083
3/17/08	D8C180234-005	0.053
5/27/08	D8E290327-007**	0.068
	<b>Running Annual Average</b>	<b>0.069</b>

\*Average of original sample result of 0.059 and re-extracted sample result of 0.087.

\*\*Average of original sample result of 0.071 and re-extracted sample result of 0.066.

Based on these data, the Department believes that current efforts to reduce the levels of PFOA below the State guidance level by blending water from the various wells prior to entering the water distribution system will be insufficient to consistently meet the guidance level. Therefore, the Department is recommending that New Jersey American Water – Penns Grove develop a plan to reduce the levels of PFOA below the State guidance value under normal operating conditions. A plan outlining the steps that New Jersey American Water – Penns Grove will take to reduce PFOA in the water system should be submitted to the Department within 90 days of the receipt of this letter.

The current running annual average for PFOA at TP001002, the Ranney Well field is as follows:

Sampling Date	Sample Number	PFOA Result (ug/l)
3/8/07	D7C090378-004	0.022
6/18/07	D7F190311-004	0.032
9/26/07	D71270405-004	0.013
12/17/07	D7L180307-005	0.029
3/17/08	D8C180234-001	0.024
5/27/08	D8E290327-002*	0.062
	<b>Running Annual Average</b>	<b>0.03</b>

\*Average of original sample result of 0.071 and re-extracted sample result of 0.054.

Although the running annual average for the point-of-entry results for the Ranney Well field are below the State guidance level for PFOA, individual wells in the Ranney Well field consistently exhibit levels of PFOA above the State guidance value. New Jersey American Water – Penns Grove should include in the plan requested above, a sampling plan for continued monitoring of the Ranney Well field that will sufficiently characterize the levels of PFOA under normal operating conditions.

If you have any questions on this matter, please contact me or Betty Boros-Russo of my staff at (609) 292-5550. When contacting the Department please reference the PWSID No. NJ1707001 and Letter No. WLT070001.

Sincerely

Barker Hamill  
Assistant Director  
Water Supply Operations

cc: Betty Jane Boros-Russo, BSDWTA  
Karen Fell, BSDWI  
Sandra Krietzman, BSDWTA  
Mark Mauriello, DLUR  
Linda Ofori, BSDWI  
Fred Sickels, BSWP  
Southern Bureau of Water Compliance and Enforcement